HOWARD LEADER
ATTORNEY AT LAW
800 THIRD AVENUE
SUITE 2501
NEW YORK, NEW YORK 10022
TELEPHONE (646) 533-7696
FACSIMILE (646) 590-9676
E-MAIL HOWARD.LEADER@PROTONMAIL.COM

FILED VIA ECF

Hon. Jesse M. Furman United States District Judge United States Courthouse Southern District of New York 500 Pearl Street New York, New York 10007

August 23, 2021

United States v. Orlando CARMONA-SERRANO (S10) 16 Cr. 387 (JMF)

Dear Judge Furman:

As counsel of record for Mr. Carmona-Serrano in this matter, I am writing to request a rescheduling of both the briefing schedule next conference in this matter for sixty (60) days. The government consents. As the Court will recall, defense motions are currently scheduled to be filed by September 10, 2021 and the next status conference is on September 14, 2021.

The reason for the request is to allow the defense additional time to review the discovery, which, as the Court can appreciate, is very voluminous. Counsel is advised that the government is also providing a substantial tranche of additional discovery shortly. Further, the Court should know that, unfortunately, Mr. Carmona-Serrano has encountered great difficulty in being able to review what is now in his possession. While this issue appears now to have been resolved, discovery review must still be completed, and counsel anticipates that many documents will require translation from English to Spanish, requiring further time. Consequently, we must ask the Court to revise the current schedule.

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For these reasons, we ask that both the briefing schedule and the conference in this matter be adjourned for sixty (60) days until a date in mid-November that is convenient for the Court. We would consent to an exclusion under the Speedy Trial clock in these circumstances.

Respectfully submitted,

/s/ HOWARD LEADER

cc: Adam Hobson, Esq.,
Assistant United States Attorney (VIA ECF)

Application GRANTED. Defense motions are due by November 3, 2021. The Government shall file its opposition by November 17, 2021. Defendant shall file any reply by November 24, 2021. The pretrial conference is hereby ADJOURNED to November 9, 2021, at 10:00 a.m. Time is excluded in the interests of justice from today, August 24, 2021, until November 9, 2021, to allow the defendant and counsel to continue reviewing the discovery, to consider what if any motions should be filed, and to prepare and file those motions. The Clerk of Court is directed to terminate Doc. #546. SO ORDERED.

August 24, 2021